



ROCKY MOUNTAIN CHAPTER
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Mr. Brian Amme
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RE: Comments on the PEIS/PER for weed management on BLM lands

Dear Mr. Amme;

1 The Sierra Club in Colorado has approximately 20,000 members, most of whom have an interest in and some personal familiarity with BLM's lands in Colorado and Utah, especially those areas with wilderness characteristics. In general, the Club believes that controlling exotic and invasive species on public land is important for protecting native ecosystems. However, one can argue about methods, and this PEIS/PER has some apparent flaws that we would like to point out:

2 1. As far as we can tell from perusing the document, there is no mention of, or plan for the use of, insect predators to control the exotics that can be controlled by them. These insects have been fairly thoroughly vetted by the USDA for their non-impacts on native species, and, in fact, are available essentially free to public (at least in Colorado) from the Insectary in Palisade, CO. In Boulder County, use of several predatory beetles for diffuse knapweed control has been successfully demonstrated by Prof. Timothy Seastedt of the Biology Dept. of the University of Colorado in Boulder. I understand that there are effective predators for another common exotic, the species of which escapes me right now (perhaps field bindweed or leafy spurge?). At least as far as diffuse knapweed is concerned, to have a program for spraying for this species is a thorough waste of time and public money. Prof. Seastedt believes that the same insects will have similar effectiveness against spotted knapweed. And of course, we all know that BLM is experimenting with an insect for controlling tamarisk, and that preliminary results are

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encouraging. If it is effective, using herbicide is a waste of time and energy for that species as well.

- 4 2. More generally the document seems to lack a compelling scientific argument for why the large-area spraying program discussed is going to have any long-term impacts on the BLM's goal of fire reduction. (Or perhaps the real goal is long term employment for the pest control profession!) If there's a proof of concept study out there demonstrating this, then the BLM really should tell us about it. Buying into a multimillion dollar, risky management program without a large-scale proof of management efficacy is unacceptable and resource-wasting. We all know that the accepted and proposed new herbicides kill weeds. What we do not know is what returns 2-5 years after the treatment, and how this recovery alters the fuel loads in ways that are considered acceptable, desirable, and ecologically and economically significant.
- 5 Thank you for your consideration of these remarks. Please note that they represent a Chapter-scale supplementation of comments that our national organization may send in addressing the whole program.

Sincerely,



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